

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

QUALCOMM INC., a Delaware corporation,  
and QUALCOMM TECHNOLOGIES, INC.,  
a Delaware corporation,

Plaintiffs,

v.

ARM HOLDINGS PLC, f/k/a ARM LTD., a  
U.K. corporation,

Defendant.

C.A. No. 24-490-MN

**REDACTED -  
PUBLIC VERSION**

**(Filed November 21, 2025)**

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**ARM HOLDINGS PLC'S MOTION TO STRIKE THE EXPERT REPORTS AND  
TESTIMONY OF PATRICK F. KENNEDY**

Pursuant to the Court's Order Appointing Special Master (D.I. 336), Arm Holdings plc ("Arm") hereby moves the Court for an order striking certain testimony of Dr. Kennedy that is based on damages theories that Plaintiffs did not disclose during fact discovery, as set forth in the proposed order attached hereto.

The grounds for this motion are fully set forth in Arm's Opening Letter Brief and the Declaration of Peter Evangelatos, which were submitted to the Special Master contemporaneously herewith. Pursuant to D. Del. LR 7.1.1., undersigned counsel certifies that a reasonable effort was made to reach agreement with Qualcomm regarding the matters set forth in this motion, including oral communication involving Delaware counsel for all parties, and no agreement was reached.

Dated: November 14, 2025

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**HIGHLY CONFIDENTIAL -  
ATTORNEYS' EYES ONLY  
FILED UNDER SEAL**

**PROPOSED ORDER GRANTING ARM'S MOTION TO STRIKE**

IT IS HEREBY ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2025, that Arm Holdings plc's Motion to Strike is GRANTED as follows:

- (1) Dr. Kennedy's testimony based on damages theories that Qualcomm Inc. and Qualcomm Technologies, Inc. (collectively "Qualcomm") failed to disclose during fact discovery, as described in Arm Holdings plc's Motion to Strike, are stricken; and
- (2) Qualcomm shall not rely on or offer into evidence at trial any of Dr. Kennedy's stricken testimony.

IT IS FURTHER ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2025 that Qualcomm Inc. and Qualcomm Technologies Inc.'s new theories will be stricken.

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Helena C. Rychlicki  
Special Master

**RULE 7.1.1 CERTIFICATION**

Pursuant to D. Del. Local Rule 7.1.1, counsel for Arm hereby certifies that they have made a reasonable effort to reach agreement with counsel for Plaintiffs Qualcomm Inc. and Qualcomm Technologies, Inc. (collectively, “Plaintiffs”) regarding the matters set forth in Arm’s Motion to Strike the Expert Reports and Testimony of Patrick F. Kennedy, including oral communication involving Delaware counsel for all parties. Plaintiffs have advised that they will be opposing Arm’s motion.

Dated: November 14, 2025

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on November 14, 2025, a copy of the foregoing document was served on the counsel listed below in the manner indicated:

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